

STATE OF ILLINOIS            )  
  )     SS  
COUNTY OF COOK            )

**AFFIDAVIT**

J. Gregory Deis, Assistant United States Attorney, being duly sworn, deposes and states as follows:

1. I am the Assistant United States Attorney who is assigned to handle *United States v. Chinchilla-Linares et al.*, No. 08 CR 63. This affidavit is submitted in support of the government's request that this Court issue 10 material witness warrants.

2. Defendants Boris Chinchilla-Linares and Jose Domingo-Castro were indicted on February 6, 2008. The indictment alleges that, on or about January 28, 2008, defendants, for the purpose of private financial gain, knowing and in reckless disregard of the fact that certain aliens had come to, entered, and remained in the United States in violation of law, did transport and move such aliens, namely 10 nationals from Mexico, Guatemala and El Salvador, within the United States by means of transportation and otherwise, in furtherance of such violation of law, n violation of Title 8, United States Code, Sections 1324(a)(1)(A)(ii) and 1324(a)(1)(B)(I), and Title 18, United States Code, Section 2.

3. The defendants are not yet scheduled for arraignment.

4. The following individuals are currently in the administrative custody of the Department of Homeland Security, Immigrations and Customs Enforcement, and are subject to imminent deportation. However, these individuals have information material to the prosecution of the defendants. Therefore, the government respectfully requests that this Court issue material witness warrants for the following individuals:

<u>NAME</u>	<u>DATE OF BIRTH</u>	<u>ALIEN NUMBER</u>
Esteban Moran-Hernandez	November 20, 1991	A95 725 209
Estela Mota-Gamez	July 25, 1991	A77 657 610
Julio Mejia-Mejia	July 24, 1968	A77 657 610
Emma Ramos-Ibanez	March 7, 1979	A77 657 613
William Orlando Vazquez-Villegas	May 3, 1983	A77 657 611
Mefi Adiel Grijalva	June 30, 1985	A77 657 612
Josue Morales	June 10, 1978	A77 657 609
Julio Garcia-Gonzalez	February 17, 1985	A77 657 608
Abel Grijalva-Revolorio	February 11, 1983	A77 657 607
Lucas Rodriguez-Ascencio	October 18, 1980	A77 657 582

4. The government seeks to have the aforementioned individuals transferred to the custody of the U.S. Marshals Service in order to preserve the parties' opportunity to take depositions of these individuals. *See* Fed. R. Crim. Pro. 15. Accordingly, the government suggests that a status hearing be set for 30 days from the date the warrants are issued, at which time the continued detention of some or all of these individuals can be further evaluated.



**J. GREGORY DEIS**

Assistant United States Attorney

SUBSCRIBED AND SWORN TO BEFORE ME

this 8th day of February 2008

  
NOTARY PUBLIC

